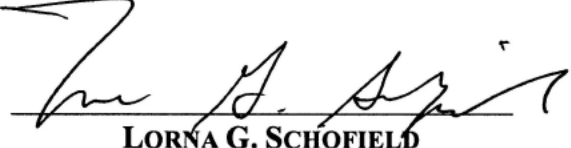


Application **GRANTED**. The initial pretrial conference scheduled for December 11, 2024, is **ADJOURNED** to **January 22, 2025, at 4:00 P.M.** At that time, the parties shall call (855) 244-8681 and enter the access code 23111938649. The parties' deadline to submit the joint letter and the proposed civil case management plan is extended to **January 15, 2025**.

Dated: December 4, 2024
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

VIA ECF

Hon. Lorna G. Schofield
United States District Judge-SDNY
500 Pearl Street
New York, New York 10007

Re: ***The Travelers Indemnity Company v. Underwriters At Lloyd's London severally subscribing to Policy No.: B1230AC08244A19***
Civil Action Number: 1:24-cv-08029
Our Matter Number: 2024092129

Dear Judge Schofield:

The undersigned represents the Plaintiff, The Travelers Indemnity Company ("Travelers"), in the above referenced matter. Travelers filed the Declaratory Judgment action on October 23, 2024. [D.E.1]. A Summons was issued and served against Underwriters At Lloyd's London ("Lloyd's"). The Affidavit of Service which sets forth that the Summons and Complaint with attachments was served on November 8, 2024 to Barbara Demosthene at Lloyd's. I was contacted by Ms. Demosthene that same day and she requested additional information as to the alleged Policies which was later provided under separate cover. I have been contacted by Ken Fiorella of Gallo Vitucci Klar, LLP who was just retained by Lloyd's. It is counsel's position that there are significant jurisdictional issues that may be at issue in this case, and he has provided the undersigned with legal authority to review. The undersigned is in the process of reviewing and analyzing same. Pursuant to the Court Order dated October 24, 2024, there is a telephonic conference scheduled for December 11, 2024, and the parties are ordered to file a Joint Letter on ECF by December 4, 2024.

At this time, Travelers is requesting an adjournment of the telephonic conference and extension of the deadline to file a Joint Letter so as to allow the Defendant's counsel time to prepare and file a Notice of Appearance or in the alternative, to determine if there is in fact a jurisdictional issue that requires a transfer of venue to state court. Travelers is making this request in the interest of judicial efficiency and to avoid unnecessary delays moving forward as comply with the Court's deadlines.

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company and its Property Casualty Affiliates.

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Thank you in advance for your consideration.

Respectfully submitted,

/s/ Michele A. Lo Presti-Wouters

Michele A. Lo Presti-Wouters

MAL/aly

cc: Ken Fiorella, Esq. (via E-Mail)